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April 5, 2002

Mr. Tom Turner
U.S. EPA, Region V
77 West Jackson Street
Chicago, IL 60604-3590
Mail Code C-14J

EPA Region 5 Records Ctr.



285416

RE: Clayton Chemical Company Superfund Site, Sauget, Illinois (St. Clair County)

Dear Mr. Turner:

I am writing on behalf of Swan Corporation ("Swan") which attended the meeting held by you, on behalf of the United States Environmental Protection Agency ("USEPA"), on Thursday, March 28, 2002, in East St. Louis, Illinois. The purpose of this meeting was to discuss the Clayton Chemical Company Superfund Site in Sauget, Illinois. In addition to you and other representatives of USEPA, also present at the meeting were representatives of the Illinois Environmental Protection Agency as well as the Illinois Attorney General's office.

At that meeting, you indicated that the USEPA had identified Swan and other parties as PRPs at the site. You also stated that EPA would like these PRPs to agree to take two actions: those being to remove the allegedly hazardous liquids stored at the site and various tanks and barrels, as well as to remediate allegedly contaminated soil at the site. You further stated that unless the PRPs agree to undertake these actions, it was EPA's intention to fund and perform those above stated activities.

You indicated that you desired to have a response from the PRPs as to their willingness to proceed toward a resolution of USEPA's demands. This response complies with our understanding as to what you will seek from PRPs and constitutes a good faith response to USEPA's request.

Subsequent to that meeting, a telephonic conference was held with many of the PRPs present at that meeting. We agreed to meet further to discuss the USEPA's position with respect to this site. Swan is committed to participate in this process and will continue to do so. We understand that among the items to be discussed at any future meeting is the formation of a PRP group. Swan will participate in those discussions as well.

Mr. Tom Turner

April 5, 2002

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Should you have any questions, please feel free to contact me. With regards, I am,

Very truly yours,

GREENSFELDER, HEMKER & GALE, P.C.

By

Eugene P. Schmittgens, Jr.

EPS:scs

529495

cc: Mr. Kevin Kuhnke